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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA, SOUTHERN DIVISION

SABINE MOSS, an individual,

Plaintiff,

vs.

CASE NO: 2:20-cv-01275-JCM-BNW

MUTUAL OF ENUMCLAW INSURANCE
COMPANY; USAA CASUALTY
INSURANCE COMPANY; I through X,
inclusive,; and ROE CORPORATIONS I
through X, inclusive,

Defendants.

**STIPULATION AND ORDER EXTENDING TIME FOR DEFENDANT MUTUAL OF
ENUMCLAW INSURANCE COMPANY'S MOTION TO DISMISS PLAINTIFF'S
COMPLAINT FOR LACK OF PERSONAL JURISDICTION
(FIRST REQUEST)**

IT IS HEREBY STIPULATED by and between the parties, through their respective
attorneys of record herein:

That the time for the parties to respond to Defendant Mutual of Enumclaw Insurance
Company's Motion to Dismiss Plaintiff's Complaint for Lack of Personal Jurisdiction, which
was filed in U.S. District Court on July 27, 2020, be extended by one week from August 10,
2020 to August 17, 2020;

That the time for Mutual of Enumclaw to submit a brief in reply will also be extended
accordingly.

No hearing or oral argument on said motion has yet been scheduled.

This is the first stipulation for extension of time to respond to any motion. That the reason for this extension is that each of the parties are currently working on resolving certain issues and streamlining the nature of the pending litigation, including a stipulated dismissal without prejudice and a potential re-filing of the Complaint against the two Defendants in a jurisdiction that may be more appropriate for this suit.

DATED this 10 th day of August, 2020.

DATED this 10 th day of August, 2020.

ERIC ROY LAW FIRM

**BREMER WHYTE BROWN &
O'MEARA LLP**

//s// Michael Nixon
Eric Roy, Esq.
Nevada State Bar No. 11869
Michael T. Nixon, Esq.
Nevada State Bar No. 12839
703 South Eighth Street
Las Vegas, Nevada 89101
(702) 423-3333
Attorney for Plaintiff

//s// Melissa Ingleby
Melissa Ingleby, Esq.
Nevada State Bar No. 12935
1160 N. Town Center Dr. Ste 250
Las Vegas, Nevada 89144
(702) 258-6665
*Attorney for Defendant,
Mutual of Enumclaw Insurance*

DATED this 10 th day of August, 2020.

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**

//s// Christopher Richardson
Christopher Richardson, Esq.
Nevada State Bar No. 9166
525 Market Street, 17th Floor
San Francisco, CA 94105
(415) 433-0990
Attorney for Defendant, USAA Casualty Insurance

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ORDER (CASE NO: 2:20-cv-01275-JCM-BNW)

IT IS HEREBY ORDERED THAT:

That the time for the parties to respond to Defendant Mutual of Enumclaw Insurance Company's Motion to Dismiss Plaintiff's Complaint for Lack of Personal Jurisdiction, which was filed in U.S. District Court on July 27, 2020, be extended by one week from August 10, 2020 to August 17, 2020;

IT IS HEREBY FURTHER ORDERED THAT:

That the time for Mutual of Enumclaw to submit a brief in reply will also be extended accordingly.

IT IS SO ORDERED August 12, 2020.


UNITED STATES DISTRICT JUDGE

DATED this 10th day of August, 2020.

Submitted by:

ERIC ROY LAW FIRM

//s// Michael Nixon

Eric Roy, Esq.
Nevada State Bar No. 11869
Michael T. Nixon, Esq.
Nevada Bar No. 12839
703 South Eighth Street
Las Vegas, Nevada 89101
Attorney for Plaintiff

Eric Roy Law Firm
703 South Eighth Street
Las Vegas, Nevada 89101
702.423.3333

Katrina Thao

From: Michael Nixon
Sent: Monday, August 10, 2020 4:10 PM
To: Katrina Thao
Cc: SabineMossZ634118@projects.filevine.com
Subject: FW: Moss v. Mutual of Enumclaw Insurance Company (BWBO 1472.002)



Michael Nixon, Esq.
ERIC ROY LAW FIRM

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From: Melissa Ingleby <mingleby@bremerwhyte.com>
Sent: Monday, August 10, 2020 4:10 PM
To: Michael Nixon <Michael@ericroylawfirm.com>
Subject: Re: Moss v. Mutual of Enumclaw Insurance Company (BWBO 1472.002)

Looks good! You may use my e-signature.

Melissa Ingleby

[Bremer Whyte Brown & O'Meara, LLP](#) | Las Vegas, NV

d: 725.210.8817

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From: Michael Nixon <Michael@ericroylawfirm.com>
Sent: Monday, August 10, 2020 4:07 PM
To: Melissa Ingleby <mingleby@bremerwhyte.com>
Subject: RE: Moss v. Mutual of Enumclaw Insurance Company (BWBO 1472.002)

*** This is an external email ***

Sounds good to me. See the attached proposed SAO. Let me know if you would like any changes.

Katrina Thao

From: Michael Nixon
Sent: Monday, August 10, 2020 4:12 PM
To: Katrina Thao
Cc: SabineMossZ634118@projects.filevine.com
Subject: FW: Moss v. USAA



Michael Nixon, Esq.
ERIC ROY LAW FIRM

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From: Richardson, Chris <Chris.Richardson@wilsonelser.com>
Sent: Monday, August 10, 2020 4:11 PM
To: Michael Nixon <Michael@ericroylawfirm.com>; Podesta, John <John.Podesta@wilsonelser.com>
Cc: eric <eric@ericroylawfirm.com>; Jennifer Pascual <Jennifer@ericroylawfirm.com>;
SabineMossZ634118@projects.filevine.com
Subject: RE: Moss v. USAA

Feel free to affix my e-signature. Thank you

From: Michael Nixon [<mailto:Michael@ericroylawfirm.com>]
Sent: Monday, August 10, 2020 4:08 PM
To: Richardson, Chris <Chris.Richardson@wilsonelser.com>; Podesta, John <John.Podesta@wilsonelser.com>
Cc: eric <eric@ericroylawfirm.com>; Jennifer Pascual <Jennifer@ericroylawfirm.com>;
SabineMossZ634118@projects.filevine.com
Subject: RE: Moss v. USAA

[EXTERNAL EMAIL]

Chris,

In the interim, please see the attached SAO to extend the briefing deadline for Enumclaw's MTD. I am awaiting comments or approval from Ms. Ingleby. Please let me know your thoughts on the same.